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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

HALCYON HORIZONS, INCORPORATED, a California corporation, d/b/a ELEVATE ADDICTION SERVICES, Plaintiff, v. DELPHI BEHAVIORAL HEALTH GROUP, LLC, a Delaware corporation, and ELEVATE RECOVERY, LLC, a Delaware corporation, d/b/a ELEVATE RECOVERY CENTER, Defendants.	Case No. 17-cv-1886 **COMPLAINT FOR:** **(1) TRADEMARK INFRINGMENT, 15 U.S.C. § 1114 (COUNTS I AND II);** **(2) FALSE ADVERTISING, 15 U.S.C. § 1125 (COUNT III);** **(3) UNFAIR COMPETITION IN VIOLATION OF CAL. BUS. AND PROF. CODE §§ 17200, et seq. (COUNT IV); and** **(4) FALSE ADVERITSING IN VIOLATION OF CAL. BUS. AND PROF. CODE §§ 17500, et seq. (COUNT V).**

Plaintiff Halcyon Horizons, Incorporated d/b/a Elevate Addiction Services ("Plaintiff Elevate") alleges as follows for its Complaint against Defendants Delphi Behavioral Health Group, LLC ("Delphi") and Elevate Recovery, LLC ("ER"), d/b/a Elevate Recovery Center (collectively "Defendants"):

NATURE OF THE CASE

1. Plaintiff Elevate is the exclusive licensee of two federally registered trademarks for "ELEVATE ADDICTION SERVICES" (the "ELEVATE Marks"), which it uses in connection with its trusted and respected addiction recovery services. Plaintiff Elevate has used the ELEVATE Marks since at least as early as September 2015. Defendants are infringing the ELEVATE Marks by calling their competing addiction recovery center "Elevate Recovery Center." Defendants are also falsely advertising the services that they claim to offer at their "Elevate Recovery Center," and/or unlawfully providing addiction recovery services without a license as required by California law.

THE PARTIES

2. Plaintiff Elevate is a California company with its principal place of business at 262 Gaffey Road, Watsonville, California 95076.

3. On information and belief, Defendant Delphi is a Delaware company with its principal place of business at 3107 Stirling Road, Suite 308, Fort Lauderdale, Florida 33312.

4. On information and belief, Defendant ER is a Delaware company with its principal place of business at 1827 N. Case Street, Orange, California 92865.

JURISDICTION AND VENUE

5. This action arises under the federal Trademark Act, 15 U.S.C. § 1051, *et seq.* This Court has subject matter jurisdiction over this action under 15 U.S.C. § 1121 and 21 U.S.C. §§ 1331, and 1338(a) and (b).

6. Venue is properly founded in this judicial district pursuant to 28 U.S.C. §§ 1391(b) and/or 1400, because a substantial part of the events giving rise to the claims herein occurred within this judicial district, and because a substantial number of consumers of Plaintiff's services who reside in this district may be confused by Defendants' infringing conduct. Further, Plaintiff Elevate

is headquartered and has its principal place of business in this judicial district, offers its services in this judicial district, and has been harmed by Defendants' conduct in this judicial district.

INTRADISTRICT ASSIGNMENT

7. This is an intellectual property action and therefor shall be assigned on a district-wide basis per Civil L.R. 3-2(c).[1]

PLAINTIFF'S REGISTERED TRADEMARKS

8. Plaintiff Elevate is the exclusive licensee of the "ELEVATE ADDICTION SERVICES" word mark for use in connection with addiction recovery services. This federal trademark registration has a registration date of August 2, 2016 (U.S. Trademark Registration No. 5,014,560). A true and correct copy of U.S. Trademark Registration No. 5,014,560 is attached as Exhibit A.

9. Plaintiff Elevate is also the exclusive licensee of the figurative mark:

for use in connection with rehabilitation of alcohol and drug addicted patients. This federal trademark registration has a registration date of July 5, 2016 (U.S. Trademark Registration No. 4,993,239). A true and correct copy of U.S. Trademark Registration No. 4,993,239 is attached as Exhibit B.

10. Pursuant to an Exclusive Trademark License Agreement ("Exclusive License") between Plaintiff Elevate and Plaintiff Elevate's CEO Daniel Manson, Plaintiff Elevate has "an exclusive (even as to Licensor as an individual), perpetual, royalty-free, right and license to use" the ELEVATE Marks "in and throughout the United States, its territories and possessions and Puerto Rico: (i) as part of Licensee's corporate name and tradename; (ii) in connection with providing addiction treatment and rehabilitation services for alcohol and substance-addicted

[1] This case is also related to Case No. 17-cv-756-JST.

individuals (collectively, 'Services')." A true and correct copy of the Exclusive Trademark License Agreement is attached as Exhibit C.

11. Pursuant to the Exclusive License and an Amendment to the Exclusive Trademark License Agreement between Plaintiff Elevate and Mr. Manson, Plaintiff Elevate also has the unrestricted right to prosecute actions against infringers of the ELEVATE Marks, like Defendants in this case. A true and correct copy of the Amendment to the Exclusive Trademark License Agreement is attached as Exhibit D.

12. Prior to applying for the ELEVATE Marks, Plaintiff Elevate conducted a search for others using the "Elevate" name in connection with addiction recovery services. That search revealed no other companies using the "Elevate" name in connection with recovery services, including without limitation Defendants' "Elevate Recovery Center."

13. Plaintiff Elevate has continually used the ELEVATE Marks in commerce since at least September 2015, in connection with addiction recovery services. Plaintiff Elevate offers its services at its center located in Watsonville, California.

14. Plaintiff Elevate is a trusted and respected addiction recovery center, and has spent substantial resources establishing its brand and reputation, as well as substantial goodwill, under the ELEVATE Marks.

15. Plaintiff Elevate is licensed and certified by the State of California's Department of Health Care Services to provide Individual Sessions, Recovery or Treatment Planning, Group Sessions, Educational Sessions, Detoxification, Outpatient, Day Treatment and/or Other Drug Services and is accredited by the Joint Commission as a Behavioral Health Care Program, all under the "Elevate Addiction Services" name.

16. Plaintiff Elevate has been awarded as a "Program of Distinction" by the California Consortium of Addiction Programs and Professionals, also known as CCAPP, also under the "Elevate Addiction Services" name. Plaintiff Elevate is also a member of the NAATP (National Association of Addiction Treatment Providers) as an accredited provider.

17. Plaintiff Elevate has received stellar reviews on multiple websites, including: www.psychologytoday.com, www.rehabs.com, www.rehabreviews.com, www.facebook.com,

www.yelp.com, including such comments as: "This facility is your best chance if you have an addiction problem."; "Elevate saved my family, I would recommend it to anyone and everyone who is in need of treatment."; "It was a great experience and have nothing but positive stuff to say at the end of the day! Thank you Elevate!"; "Having seen several different facilities, I know that Elevate are a very high quality outfit. Through understanding, and going the extra mile, are standout qualities that will assist any recovering addict."; "The people at Elevate Addiction services are the best! They look at the whole situation that brought someone to them. I've never seen such positive results at a profound and lasting level!"; "I was particularly impressed by the way they take time to understand each person really well; they understand that one size does not fit all!"; "Staff is really friendly. They give you the tools to get your life back. And it is your best chance at overcoming addiction and actually recovering."

18. Plaintiff Elevate also participates in a number of community events, all under the "Elevate Addiction Services" name. These activities include co-hosting events with the local sheriff's department, chaperoning and volunteering at Watsonville High School's Sober Grad Night, volunteering annually at Loaves and Fishes serving Thanksgiving meals to homeless shelter residents, participating in the yearly holiday Purist Toy Drive, sponsoring local women's shelters providing meals and gifts for the mothers and children, providing addiction education and prevention lectures at no cost to the public, funding and operating drug abuse awareness and prevention booths at the Santa Cruz and Monterey County fairs.

19. Plaintiff Elevate has made considerable investments of both time and money in advertising, branding and marketing the Elevate Addiction Services name, and using the ELEVATE Marks in commerce. Plaintiff Elevate has generated substantial goodwill, an excellent reputation for providing high-quality services, and a strong recognition of its brand, all under the ELEVATE Marks.

DEFENDANTS' WILLFUL INFRINGEMENT

20. Defendants have and continue to infringe the ELEVATE Marks, by calling their competing recovery center "Elevate Recovery Center."

21. Defendants' "Elevate Recovery Center" is located in Orange County, California.

22. On information and belief, Defendants provide addiction treatment services for the rehabilitation of drug, alcohol and narcotic addicted patients at their "Elevate Recovery Center."

23. Defendants advertise "Elevate Recovery Center" as offering residential treatment, detoxification, and outpatient addiction recovery services, among other services.

24. On information and belief, "Elevate Recovery Center" is neither licensed nor certified to provide residential, detoxification or outpatient services in California.

25. On information and belief, Defendants maintain or control a website that advertises and markets "Elevate Recovery Center" at the domain https://elevaterecoverycenter.com. This differs from Plaintiff Elevate's domain, https://elevaterecoverycenters.com, only by a single letter, "s". Defendants also maintain or control a Facebook page under the name "Elevate Recovery Center."

26. On August 4, 2016, Plaintiff Elevate, through its counsel, sent a letter to Matthew Agular, Program Director for "Elevate Recovery Center," advising Mr. Agular of Plaintiff Elevate's trademark rights.

27. On or about September 13, 2016, Defendant ER filed an application for trademark registration of the mark "ELEVATE" for use in connection with "[a]ddiction treatment services; rehabilitation of drug, alcohol and narcotic addicted patients."

28. On December 28, 2016, the United States Patent and Trademark Office ("Trademark Office") issued an Office Action refusing Defendant ER's registration application, and finding a likelihood of confusion with the ELEVATE Marks.

CONSUMER CONFUSION

29. There have been multiple instances of actual consumer confusion between Plaintiff Elevate and Defendants' "Elevate Recovery Center." For example, consumers mistaking Plaintiff Elevate for Defendants' "Elevate Recovery Center" have called Plaintiff Elevate to complain about Defendants' business practices, and attributed those practices to Plaintiff Elevate.

30. There is also a likelihood of consumer confusion because Plaintiff Elevate and Defendants, through the "Elevate Recovery Center," offer the same or similar services to the same consumers, using identical or substantially identical marks.

31. For example, a web search for "Elevate Recovery" or "Elevate Recovery Center" pulls up pages associated with both Plaintiff Elevate and Defendants. While Plaintiff Elevate has a 5-star rating with 145 reviews on Facebook, Defendants' Facebook rating is 3.4 based on 5 reviews.

FALSE ADVERTISING

32. California law requires that residential facilities in California that provide recovery and treatment services, including detoxification services, must be licensed. *See* Cal. Health & Safety Code §§ 11834, et seq.; California Code of Regulations, Title 9, Division 4, Chapter 5, §§ 10501, et seq. Licensing is provided by the State of California's Department of Health Care Services ("DHCS"). On information and belief, Defendants' "Elevate Recovery Center" is not licensed by DHCS.

33. Nonetheless, Defendants advertise residential recovery and treatment services, including detoxification services, as being provided at their "Elevate Recovery Center." For example, Defendants' advertising materials for "Elevate Recovery Center" expressly describe residential treatment services, stating for example, "Recovery is hard work. Live and rest in bright, clean, modern rooms;" and the page entitled "Elevate Services" lists "Elevate Recovery Center is here through each step. 1. Intervention 2. Detox 3. Residential Treatment 4. Sober Living 5. Continuing Participation." Defendant Delphi's website also describes "Elevate Recovery Center" as "a 40-bed facility in picturesque Orange, CA utilizing acute and extended care treatment."

34. Defendants have authenticated advertising materials that identify residential recovery and treatment services, and detoxification services, as among the services offered at "Elevate Recovery Center," and have claimed that those advertising materials have been distributed to consumers since October 2015.

35. Defendants have also claimed that they do not offer services that require a license in California.

36. Defendants are therefore either: (a) falsely advertising residential recovery treatment and detoxification services that they don't provide; or (b) operating a residential recovery treatment facility without the licenses required by California law. Both unlawful and unfair acts are being performed under the "Elevate Recovery Center" name.

HARM TO PLAINTIFF ELEVATE

37. Plaintiff Elevate has and will continue to suffer both irreparable and pecuniary harm as a result of Defendants' infringing conduct, false and deceptive advertising, and unlawful and unfair business practices.

38. Plaintiff Elevate's business depends on its reputation in providing the highest quality recovery treatment services to its clients. Plaintiff Elevate has invested substantial resources in establishing a stellar reputation, and has established substantial goodwill under the ELEVATE Marks

39. In contrast, on information and belief Defendants' service offerings are poor in quality. The reviews above establish that, at a minimum, consumers' perception of Defendants' services offered at "Elevate Recovery Center" is that those services are poor in quality.

40. Defendants' unlawful use of the "Elevate" name results in harm to Plaintiff Elevate because consumers are likely to associate the services offered by Defendants at their "Elevate Recovery Center" with Plaintiff Elevate. This harm has already occurred, and is likely to continue to occur for so long as Defendants continue to use the "Elevate Recovery Center" name, or any other name that is confusingly similar to the ELEVATE Marks.

41. Defendants' false advertising of residential and detoxification services—if Defendants do not, as they have claimed, offer such services—also results in harm to Plaintiff Elevate. On information and belief, consumers are likely to believe that Defendants do offer the services that they advertise, and therefore may choose Defendants' "Elevate Recovery Center" instead of Plaintiff Elevate; consumers may associate Defendants' false advertising practices with Plaintiff Elevate; and/or consumers may believe that Plaintiff Elevate does not offer residential treatment services—which it does—because "Elevate Recovery Center" actually does not. Defendants' false advertising is thereby likely to deprive Plaintiff Elevate of consumers who would have otherwise chosen its services.

42. Defendants' offering of unlicensed, unregulated rehabilitation services, under the "Elevate Recovery Center" name, also results harm to Plaintiff Elevate. Not only does Plaintiff Elevate have no control over the quality of the services that Defendants provide at their "Elevate

Recovery Center," but because Defendants are not licensed by DHCS, the services are not monitored by any regulatory body and need not meet the requirements set forth for licensed residential recovery centers. Based on public reports of the low quality of the services provided by Defendants at "Elevate Recovery Center"—which services consumers have and may continue to associate with Plaintiff Elevate—it appears that this lack of regulation has allowed Defendants to continue to provide substandard services under the "Elevate Recovery Center" name.

43. Defendants' unlawful and unfair acts as described in the above paragraphs have caused and will continue to cause Plaintiff Elevate immediate, pecuniary and irreparable harm. As a result of Defendants' use of the "Elevate Recovery Center" name, consumers are likely to be confused, mistaken or deceived into believing that Defendants' service offerings are connected to, associated with, or sponsored by Plaintiff Elevate. Plaintiff Elevate has no control over the services offered by Defendants, which have been shown to be of substandard or poor quality, or at the very least perceived as such by consumers. The harm to Plaintiff Elevate's reputation, and the loss of goodwill that Plaintiff Elevate has established in the ELEVATE Marks, is irreparable.

44. In addition, consumers of addiction treatment services are likely to make purchasing decisions based on the quality and type of services available at the treatment facility. Plaintiff Elevate and Defendant ER are competitors in California with services that at least appear to be similar if not identical. On information and belief, Defendants' acts are likely to have deprived Plaintiff Elevate of consumers, either because those consumers instead chose Defendants' services, or because consumers elect not to choose Plaintiff Elevate's services because they believe that Plaintiff Elevate is associated with the services offered by Defendants at their "Elevate Recovery Center." Plaintiff Elevate has also been required to spend substantial time and resources to address the consumer confusion and other harm caused by Defendants' unlawful and unfair acts.

COUNT I

(Trademark Infringement Under 15 U.S.C. § 1114)

45. Plaintiff ELEVATE restates and realleges paragraphs 1 through 44 of this Complaint as though fully set forth herein.

46. Plaintiff Elevate is the exclusive licensee, and has a cognizable interest in and to U.S. Trademark Registration No. 5,014,560, and has standing to maintain an infringement action under 15 U.S.C. § 1114.

47. Without Plaintiff Elevate's authorization, Defendants have used and continue to use the name "Elevate Recovery Center" in commerce.

48. Defendants' infringing conduct has caused, and is likely to continue to cause, confusion, mistake or deception as to the affiliation, connection, source, sponsorship, or association of Defendants and their services with Plaintiff Elevate and its services.

49. Defendants had actual and constructive knowledge of U.S. Trademark Registration No. 5,014,560 during Defendants' continued use of the marks.

50. On information and belief, Defendants' infringement has been intentional and willful, and has caused and will continue to cause harm to Plaintiff Elevate, including irreparable harm to Plaintiff Elevate for which there is no adequate remedy at law.

51. Plaintiff Elevate is thus entitled to both preliminary and permanent injunctive relief, enjoining Defendants from further use of the name "Elevate Recovery Center," or any similarly confusing names, as well as such monetary damages permissible by law.

COUNT II

(Trademark Infringement Under 15 U.S.C. § 1114)

52. Plaintiff ELEVATE restates and realleges paragraphs 1 through 44 of this Complaint as though fully set forth herein.

53. Plaintiff Elevate is the exclusive licensee, and has a cognizable in interest in and to U.S. Trademark Registration No. 4,993,239, and has standing to maintain an infringement action under 15 U.S.C. § 1114.

54. Without Plaintiff Elevate's authorization, Defendants have used and continue to use the name "Elevate Recovery Center" in commerce.

55. Defendants' infringing conduct has caused, and is likely to continue to cause, confusion, mistake or deception as to the affiliation, connection, source, sponsorship, or association of Defendants and their services with Plaintiff Elevate and its services.

56. Defendants had actual and constructive knowledge of U.S. Trademark Registration No. 4,993,239 during Defendants' continued use of the marks.

57. On information and belief, Defendants' infringement has been intentional and willful, and has caused and will continue to cause harm to Plaintiff Elevate, including irreparable harm to Plaintiff Elevate for which there is no adequate remedy at law.

58. Plaintiff Elevate is thus entitled to both preliminary and permanent injunctive relief, enjoining Defendants from further use of the name "Elevate Recovery Center," or any similarly confusing names, as well as such monetary damages permissible by law.

COUNT III

(False Advertising Under 15 U.S.C. § 1125)

59. Plaintiff ELEVATE restates and realleges paragraphs 1 through 44 of this Complaint as though fully set forth herein.

60. Defendants advertise offering residential recovery treatment services, including detoxification services, at their "Elevate Recovery Center."

61. Defendants' advertising materials expressly describe residential treatment services, stating for example, "Recovery is hard work. Live and rest in bright, clean, modern rooms;" and the page entitled "Elevate Services" lists "Elevate Recovery Center is here through each step. 1. Intervention 2. Detox 3. Residential Treatment 4. Sober Living 5. Continuing Participation." Defendant Delphi's website also describes "Elevate Recovery Center" as "a 40-bed facility in picturesque Orange, CA utilizing acute and extended care treatment."

62. Defendants claim that they have used advertising materials that identify these services as being offered at "Elevate Recovery Center" since October 2015.

63. Defendants have asserted that they do not offer services at their "Elevate Recovery Center" that would require a license under California law. Such services include residential treatment services and detoxification services.

64. Defendants' false statements in their advertising have the tendency to deceive a substantial segment of the consumers of Defendants' services. For example, consumers are likely to

be deceived into believing that Defendants offer residential recovery treatment and detoxification services that they say they do not offer.

65. Defendants' deceptive acts are material, because, on information and belief, consumers of addiction treatment services make purchasing decisions based on the type of services available at the treatment facility.

66. On information and belief, Defendants' conduct is intentional and willful.

67. Defendants' conduct has and continues to result in harm to Plaintiff Elevate, including irreparable harm for which there is no adequate remedy at law.

68. Plaintiff Elevate is thus entitled to both preliminary and permanent injunctive relief, enjoining Defendants from further false advertising, as well as such monetary and other damages permissible by law.

COUNT IV

(Unfair Competition Under California Business and Professions Code §§ 17200, et seq.)

69. Plaintiff Elevate restates and realleges paragraphs 1 through 44 of this Complaint as though fully set forth herein.

70. Defendants' unlawful and unfair acts are described above, and are summarized as:

a. Defendants' infringement of the ELEVATE Marks (unlawful and unfair);

b. Defendants' false advertising of residential treatment and detoxification services (unlawful and unfair);

c. Defendants' provision of residential treatment and detoxification services without a license (unlawful).

71. As described herein, Defendants' acts of unfair competition have caused and will continue to cause Plaintiff Elevate irreparable harm for which there is no adequate remedy at law, including harm to Plaintiff Elevate's reputation and loss of goodwill.

72. As also described herein, Defendants' acts of unfair competition have also caused Plaintiff Elevate immediate pecuniary harm. On information and belief, Defendants' acts of unfair competition are likely to have deprived Plaintiff Elevate of consumers who have otherwise chosen treatment with "Elevate Recovery Center," or have not chosen to receive services from Plaintiff

Elevate due to a mistaken association with services offered by Defendants at their "Elevate Recovery Center," which are at least perceived by consumers as being substandard and poor. Plaintiff Elevate has also been required to spend time and resources to address Defendants' unfair and unlawful acts.

73. Plaintiff Elevate is entitled to preliminary and permanent injunctive relief, enjoining Defendants from engaging in further acts of unfair competition, as well as such monetary and other damages permissible by law.

COUNT V
(Deceptive, False and Misleading Advertising Under California Business and Professions Code §§ 17500, et. seq.)

74. Plaintiff Elevate restates and realleges paragraphs 1 through 44 of this Complaint as though fully set forth herein.

75. On information and belief, and as described above, Defendants have falsely advertised residential treatment and detoxification services when they do not offer those services to consumers.

76. Defendants' wrongful acts and false advertising statements are likely to deceive members of the public, including consumers of Defendants' advertising materials. Further, Defendants' false statements are material, because, on information and belief, consumers of addiction treatment services make purchasing decisions based on the type of services available at the treatment facility.

77. Defendants' conduct as described above constitutes deceptive, false and misleading advertising in violation of California Business and Professions Code §§ 17500 et seq.

78. Plaintiff Elevate has suffered and will continue suffer damages and also irreparable harm as a result of Defendants' false advertising, including harm to its reputation and a loss of good will. On information and belief, Plaintiff Elevate has also likely suffered a loss of business, either because consumers believe that Defendants are offering the same services as Plaintiff Elevate (and therefore choose Defendants' services over Plaintiff Elevate's services); because consumers associate Defendants' false advertising with Plaintiff Elevate; and/or because consumers are confused as to Plaintiff Elevate's service offerings as a result of Defendants' false advertising.

Plaintiff Elevate has also been harmed in that it has been required to spend time and resources addressing Defendants' deceptive, false and misleading advertising.

79. Plaintiff Elevate is entitled to preliminary and permanent injunctive relief, enjoining Defendants from engaging in further acts deceptive, false or misleading advertising, as well as such monetary and other damages permissible by law.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Elevate respectfully prays for the following relief:

A. A preliminary injunction and permanent injunctive relief, enjoining and prohibiting Defendants, their agents, servants, employees, officers, attorneys, subsidiaries, successors and assigns, and all others in active concert with Defendants, from:

   a. Using the "Elevate Recovery Center" name, or any confusingly similar names, in connection with addiction recovery services (including in their domain name);

   b. Applying for any license or other regulatory approval to offer addiction recovery services under the "Elevate Recovery Center" name, or any confusingly similar names;

   c. Assisting, aiding or abetting any other person or entity in engaging in or performing any of the activities described in paragraphs A(a) or A(b) above;

B. An award of damages in an amount to be determined at trial;

C. An award of treble damages as provided by the Lanham Act;

D. An award of attorneys' fees and costs;

E. An award of punitive damages in an amount to be determined at trial; and

F. Any further relief the Court deems appropriate.

JURY DEMAND

Plaintiff Elevate asserts its right to and demands a trial by jury pursuant to Fed. R. Civ. P. 38.

Dated: April 5, 2017

By: *s/ Jennifer Seraphine*

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